REMARKS

This Amendment is responsive to the communication of October 20, 2004. Reconsideration of **claims 1-19, 21-26, 28, 30-33 and 35-42** is respectfully requested.

The Office Action

Claims 1-6, 11-12, 17-22, 24 and 25 stand rejected under 35 U.S.C. §102(e) as being anticipated by Stopa (U.S. Patent No. 6,641,284).

Claims 26-33 stand rejected under 35 U.S.C. §102(b) as being anticipated by Okazaki (EP 10125959).

Claims 7-10, 15-16 and 23 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

Claims 7-10 are Allowable

It was indicated in the Office Action that **claim 7** would be allowable if rewritten in an independent form. Claim 7 has been written into an independent form by incorporating elements of independent claim 1. It is therefore respectfully submitted that **claim 7 and dependent claims 8-10** are allowable.

Claims 1-6, 11-12 and 15-16 Distinguish Over References

Claim 1 calls for among other elements: the support substrate and the curved reflector together defining a light aperture through which light produced by the light emitting semiconductor device passes. Applicants respectfully traverse the Examiner's interpretation of Stopa. Stopa discloses a reflector 10 having a parabolic section 14 and a PC board with an array of LEDs 42. The rear of the reflector is configured to receive the LEDs. An opposite end of the reflector is open to let the light escape. Therefore, the light aperture is defined by an open end of the reflector. To the contrary, claim 1 calls for the light aperture which is defined between the support substrate and the curved reflector. Applicants direct the Examiner's attention to Figure 1 of the present application, in which the aperture is defined by a planar surface **14** and a curved surface **16**. Nowhere does Stopa disclose or suggest that a light aperture is defined by the planar surface and curved surface as in claim 1. It is therefore respectfully submitted that **claim 1 and dependent claims 2-6, 11-12 and 15-16** distinguish

patentably over Stopa.

Regarding **claim 5**, in addition to its relationship to claim 1, claim 5 calls for among other elements: a first edge of the light emitting device to be positioned substantially aligned with an optical focus of the parabolic surface, the light emitting device extending from the first edge away from the light aperture. It is alleged in the Office Action that Stopa discloses such positioning of the light emitting device. Applicants respectfully traverse the Examiner's interpretation of Stopa. Nowhere does Stopa disclose or suggest positioning the light emitting device such that a first edge is aligned with an optical focus of the parabolic surface and the light emitting device extends from the first edge away from the light aperture as claimed in claim 5. If the Examiner persists in such interpretation of Stopa, Applicants request the Examiner refer their attention to where exactly in Stopa such limitation is disclosed. For the reasons stated, it is respectfully submitted that **claim 5** distinguishes patentably over Stopa.

Regarding **claim 12**, in addition to its relationship to claim 1, claim 12 calls for among other elements: each light emitting semiconductor device and each associated curved reflector define a light emission module, the light source including a plurality of light emitting modules arranged on the support substrate. Applicants respectfully traverse the Examiner's interpretation of Stopa. Stopa discloses a reflector 10 having a parabolic section 14 and a PC board with an array of LEDs 42. The rear concave portion of the reflector is configured to receive the LEDs. An opposite end of the reflector is open to let the light escape. Nowhere does Stopa disclose or suggest a plurality of light emitting modules arranged on a substrate, each module including an individual light emitting device and an associated reflector. At best, Stopa discloses a plurality of light emitting devices which all share the same reflector. It is therefore respectfully submitted that **claim 12** distinguishes patentably over Stopa.

Claims 17-19 and 21-25 Distinguish Over References

Claim 17 calls for among other elements: a plurality of light emission modules each including a reflective cup, and a light emitting semiconductor die. Applicants respectfully traverse the Examiner's interpretation of Stopa. Stopa discloses a reflector

10 having a parabolic section 14 and a PC board with an array of LEDs 42. The rear concave portion of the reflector is configured to receive the LEDs. An opposite end of the reflector is open to let the light escape. Stopa does not disclose a plurality of LEDs which each has its own reflector cup.

Additionally, claim 17 calls for low beam light emission modules that produce light directed at a low beam angle relative to a parabolic axis of the parabolic interface; and high beam light emission modules that produce light directed at a high beam angle relative to the parabolic axis of the parabolic interface, the high beam angle being smaller than the low beam angle. Applicants carefully reviewed Stopa and found neither disclosure nor teaching of the headlight which includes a plurality of low beam modules and high beam modules. At best, Stopa discloses a plurality of light emitting devices which all share the same reflector.

Nowhere does Stopa disclose or suggest a plurality of light emitting modules arranged on a substrate, each module including an individual light emitting device and an associated reflector, the plurality of modules including low beam and high beam modules each corresponding group of modules producing light at a different light plane. It is therefore respectfully submitted that **claim 17 and dependent claims 18-19 and 21-25** distinguish patentably over Stopa.

Regarding **claim 21**, in addition to its relationship to claim 17, claim 21 calls for among other elements: light emission module that has an edge aligned with a focus of the parabolic portion of the reflective cup and which extends laterally away from the light output opening. It is alleged in the Office Action that Stopa discloses a light emission module that has an edge aligned with the focus of the parabolic portion of the reflective cup. Stopa does not disclose such a device. Stopa discloses plurality of LEDs which is positioned in the concave of the parabolic reflector. Nowhere does Stopa disclose or suggest to align the first edge of the light emission module with the focus of the parabolic portion of the reflector such that it extends laterally away from the light output opening. It is therefore respectfully submitted that **claim 21** distinguishes patentably over Stopa.

Claims 26, 28, 30-33 Distinguish Over References

Claim 26 calls for among other elements: a translucent or transparent filling material filling the reflector and having an light-transmissive surface disposed at the reflector opening which translucent or transparent filling material is arranged at a non-perpendicular angle to the generally planar side to refractively tilt the light. Okazaki discloses an LED mounted on a base and sealed up in a light transmitting body. A parabolic reflector covers a part of the light transmitting body. Applicants submit that Okazaki does not disclose translucent or transparent filling material which is arranged at a non-perpendicular angle to the generally planar side on which the LED is mounted. (Figures 1-16). It is therefore respectfully submitted that **claim 26 and dependent claims 28 and 30-33** distinguish patentably over Okazaki.

CONCLUSION

For the reasons detailed above, it is respectfully submitted that all claims remaining in the application **(Claims 1-19, 21-26, 28, 30-33 and 35-42)** are now in condition for allowance.

Respectfully submitted,

FAY, SHARPE, FAGAN,
MINNICH & McKEE, LLP

1/20/05
Date

Scott A. McCollister
Reg. No. 33,961
Marina V. Zalevsky
Reg. No. 53,825
1100 Superior Avenue
7th Floor
Cleveland, Ohio 44114-2579
(216) 861-5582

Certificate of Mailing

Under 37 C.F.R. § 1.8, I certify that this Amendment is being

- ☐ deposited with the United States Postal Service as First Class mail, addressed to: MAIL STOP AMENDMENT, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date indicated below.
- ☐ transmitted via facsimile in accordance with 37 C.F.R. § 1.8 on the date indicated below.
- ☐ deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. 1.10 on the date indicated below and is addressed to: MAIL STOP AMENDMENT, Commissioner For Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Express Mail Label No.:	Signature
	Kara L. Krist
Date	**Printed Name**
January 20, 2005	**Kara L. Krist**

N:\GLOZ\200116\US\mvz0000256V001.doc